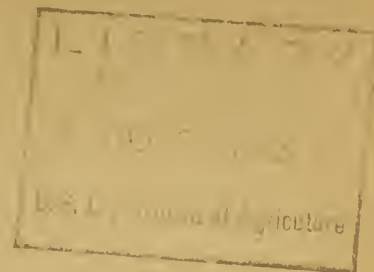


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WAR FOOD ADMINISTRATION
FOOD DISTRIBUTION ADMINISTRATION
125 Church Street
Burlington, Vermont



Administration of the Slaughter Permit Program

Handbook of Procedure for County War Meat Committees

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INTRODUCTION

This handbook is intended to make clear the procedure to be used by County War Meat Committees in administering the slaughter permit program. It includes procedure for several important functions which have recently been added to the responsibilities previously administered by the war boards under the program. As further responsibilities are included, they will be issued as supplements to this handbook.

Section I BACKGROUND INFORMATION

A. Organization of War Meat Committees

The Administrator of the War Food Administration requests that the following statement be brought to the attention of the War Meat Committee members: "Meat that is slaughtered and sold outside of the slaughter quotas and permits, the price ceilings or the rationing system is black market meat. This Nation is determined that black markets shall not flourish or interfere with the war effort and the place of food as a weapon in achieving victory. We cannot afford the waste of hides, fat and by-products where slaughtering facilities are inadequate, and, at the same time, we must prevent unsanitary slaughter which would be a menace to public health".

The meat situation is critical. We must obtain meat for our soldiers, sailors and marines, and for our Allies, as well as assure that meat is made available in legitimate channels of distribution to meet civilian rationing requirements. To do this in the face of increasing demand from civilian consumers and to avoid black markets, it is necessary:

1. That livestock be routed into normal commercial channels, preferably to inspected plants. The War Food Administration's purchases are limited to federally inspected meat, the volume of which in proportion to the total volume of slaughter has been falling off despite the fact that more plants than at any time in our history are now under such inspection.
2. That our slaughter permit system and the consumer rationing program are made to work effectively.
3. To promote sanitation in the slaughtering and handling of meat, to prevent waste, and to conserve meat by-products.

Effective functioning of the slaughter permit system depends upon wide public understanding of the reasons and necessity for it and the firm and fair administration of its provisions locally. Therefore, County War Meat Committees have been set up to advise and cooperate with the County War Boards and the area and state meat marketing supervisors in the administration of the new slaughter permit program, and it should be understood that the area meat committee will function as a sub-committee of the County War Board.

R. The functions of the War Meat Committee will be, under the general direction of the county war board and with the technical assistance of the area supervisor, as follows:

1. Assume leadership and responsibility for the meat programs in the county, which in addition to the current slaughter program may include other projects in the future.
2. Acquaint itself fully with the need for and objectives of the permit system as well as the black market problems and disseminate information concerning these by all possible means, including public meetings, group meetings with housewives, the meat industry and farmers, local public officials and semi-public organizations, through newspapers and other media. To create and maintain strong public support of meat programs so that this extremely important food may serve its fullest possibilities as a weapon of war.
3. Review outstanding permits and quotas to establish whether they are justified or excessive and when they appear excessive bring that conclusion with a statement of reasons to the attention of the area supervisor.
4. Approve or reject, in accordance with official instructions and procedures, all applications for permits received after July 1st. In the event of doubt on any application, and for guidance so as to insure uniformity with other counties, the County War Meat Committee should consult with the area supervisor before recommending such certificate. In all cases, a copy of the application for permit with notation of action taken should be forwarded to the area supervisor at the same time as the State War Board's copy is transmitted. Applications for permits should be examined closely by the committee in accordance with the objectives of the whole program.
5. Call the provisions of the meat orders to the attention of those persons who are slaughtering meat for sale without the necessary permits either through lack of knowledge of the orders or in willful disregard of them, and to obtain such compliance as possible by persuasion, dissemination of information or other informal means; and, if unsuccessful, report promptly to the State War Board so that appropriate legal steps may be taken to insure compliance.
6. Establish such additional community War Meat Committees within the county as it finds necessary, especially to carry on the educational phases of this program. Such committees should be patterned in selection of personnel after the County War Meat Committee.

The slaughter permit program is an integral part of the total meat program which seeks (1) to insure that the armed forces and lend-lease are able to purchase the meat which they urgently need, and (2) to regulate the flow of meat from producing areas to deficit areas in order that all civilians share equitably in the

available civilian supply. To this end the slaughter permit program seeks to maintain the same ratio between local slaughter and commercial slaughter as existed in 1941.

Section II

COUNTY WAR MEAT COMMITTEES' RESPONSIBILITIES IN THE PERMIT PROGRAM

There are three main steps in the permit program: (1) issuance (2) review and (3) checking to insure that permit holders keep within assigned quotas. The first step has in a large part been completed. The job now is one of reviewing permits which have been issued in order to weed out those which have been issued in error and to adjust the quotas where they were established incorrectly. THIS IS AN URGENT ACTION JOB WHICH SHOULD BE COMPLETED BY AUGUST 1st. Once the review has established a sound base for both permits and quotas, there is the continuing compliance job of checking to insure that slaughterers keep within the quotas assigned to them.

A. General instructions for issuance

To do these two operating jobs of review and of checking for compliance requires full use of all existing administrative mechanisms. At the State level there has been established a State meat marketing supervisor. Under the direction of the State War Board he will have operating responsibility for the slaughter permit program within the State. The State meat marketing supervisor will direct and supervise the work of the area supervisors in order to insure uniform application of instructions relating to permit issuance and review and the establishment and policing of quotas. The area supervisors will in turn work with the County War Meat Committee in carrying out the permit program.

Section III

PROCEDURE FOR ISSUING NEW SLAUGHTER PERMITS

It is the responsibility of the County War Meat Committee to publicize the fact that persons desiring slaughter permits shall apply to the County War Meat Committee.

The County War Meat Committee shall issue slaughter permits to farm slaughterers whose slaughter for delivery to others during the calendar year will not exceed (a) 300 pounds of meat, or (b) 3 head of livestock which may not include more than one head of cattle.

It shall also make certified recommendations on and refer to the area supervisor applications for slaughter permits received from local slaughterers and butchers and from those farm slaughterers who wish to slaughter for delivery during the calendar year in excess of 300 pounds of meat or 3 head of livestock.

The War Meat Committees have been assigned important functions in connection with the issuance of permits and the review of petitions. The success of the meat control program is largely dependent upon the handling of these functions in such a way that the basic objective of Food Distribution Order No. 27 will be attained. It should be kept in mind that the supplies of meats needed by the

Armed Forces and Lend Lease are purchased almost entirely from slaughterers having Federal inspection. Therefore, the issuance of permits and increases allowed in quota bases and quotas to slaughterers who come within the provisions of Food Distribution Order No. 27 and who do not have Federal inspection has the effect of diverting meat supplies from the channels through which governmental purchases must be made. Extreme care should be taken to restrict the issuance of permits and increases in quotas to those cases in which the applicant is clearly entitled to a quota base and to a quota under the provisions of Food Distribution Order No. 27.

In order that the procedure of the War Meat Committees may be carried out on a uniform basis, there is outlined herein in some detail the basic policy which should be followed in the issuance of permits and in the processing of petitions under the different general situations which will arise. In those instances where a particular case is not clearly covered by the policy detailed herein the War Meat Committee should make use of the technical assistance available in the office of the State meat marketing supervisor in disposing of such a case.

Note: When any new permit is issued to any slaughterer (farm slaughterers, butchers, local slaughterers, or custom slaughterers), or when any change is made in the quota base of any permit holder by the County War Meat Committee, a copy of such new permit issued and a statement setting out any change in the quota base of any permit holder should be sent to the State meat marketing supervisor.

A. Technical instructions for issuance

Issuance of permits and handling of petitions from local slaughterers, butchers and farm slaughterers.

1. Persons who did no slaughtering prior to April 1, 1943:

- (a) No temporary permits should be granted.
- (b) A permit and permanent quota base may be granted only when one slaughterer purchases the business and facilities of another slaughterer. In such a case, the following affidavits must be submitted:
 - (1) by the former owner that he will not use the quota he established in 1941 in any other plant at any time, (2) by the new owner that he will deliver products from the plant to substantially the same customers, in substantially the same area, in proportionate amounts as did the previous owner during the last three months in which he engaged in business.

2. Persons who began operations after September 30, 1942 and before April 1, 1943 and:

- (a) Were given authority to deliver controlled meats under Meat Restriction Order No. 1.
 - (1) Such persons may be granted a permit and a quota base equivalent to their authorized deliveries of

controlled meats under Meat Restriction Order No. 1. The quota of livestock which they may slaughter will be determined and announced from time to time by the Director.

- (2) A petition for an increase in the quota base provided for in paragraph (1) may be granted only in accordance with an area adjustment authorized by the Director.

(b) Livestock was slaughtered for them on a custom basis by persons who complied with Meat Restriction Order No. 1.

- (1) A quota base may be granted equivalent to the average monthly slaughter done on a custom basis. The quota will be determined and announced from time to time by the Director.
- (2) A petition for an increase in the quota base provided for in paragraph (1) may be granted only in accordance with an area adjustment authorized by the Director.

3. Persons who began operations after September 30, 1942, and before April 1, 1943, and who were not authorized to make deliveries under Meat Restriction Order No. 1.

- (1) If a person had made substantial preparations in good faith prior to October 1, 1942, with the view of engaging in slaughtering, he should be denied any quota base as to beef and may be given a quota base as to other types of livestock equivalent up to a maximum of 75 percent of his average monthly slaughter of such types for the period he was in business.
- (2) If a person started construction of facilities after October 1 and began slaughtering prior to April 1 he should be denied a quota base as to beef but may be given a quota base as to other types of livestock up to a maximum of 50 percent of his average monthly slaughter.
- (3) If a person started construction of facilities after October 1, 1942 and does not have adequate facilities for slaughtering and conserving offal, he should be denied a quota base.
- (4) If it be shown that any person falling under paragraph (a) or paragraph (b) was a wilful violator of Meat Restriction Order No. 1, he should be denied a quota base.

Note: Within this class will fall a large proportion of the local slaughterers' and butchers' permits which will be affected under Amendment 2 and Director Order 2. This class will include a number of persons who wilfully engaged in black market operations and will also include a number of legitimate retailers who began slaughtering due to difficulties in obtaining a supply of meats from usual sources. Every effort should be made to determine whether the permit holder was guilty of a violation of Meat Restriction Order No. 1 through ignorance or whether he was a wilful violator. Wilful violators or black market operators during the period of September 30 to April 1 should be given little consideration. In handling these cases, all the facts should be obtained and discretion used in granting quotas, the maximum quota being the percentage as set out in paragraph (a) and (b).

4. Persons who began slaughtering after January 1, 1942, and prior to October 1, 1942.

- (a) A permit may be granted and a quota base assigned equivalent to the slaughter for each month prior to October 1 in which they slaughtered. For months of October, November and December, and for any months prior to October 1, 1942, in which the person did not engage in slaughter, he may be assigned a quota base equivalent to the average slaughter of the months in which he slaughtered between January 1, 1942 and October 1, 1942. The quota of livestock which may be slaughtered will be determined and announced from time to time by the Director.

5. Persons who have a 1941 quota base

- (a) The quota base for local slaughterers and butchers is the slaughter for the corresponding month in 1941. In case the person did not slaughter during certain months of 1941, the quota base for the months in which he did not slaughter shall be the average of the slaughter for the months during which he was engaged in business.
- (b) On petition, the quota base may be adjusted:
- (1) Where one month is abnormal. In such case a corresponding adjustment should be made in other months so that the yearly quota base will not be increased.
 - (2) Where a general area adjustment has been authorized.
 - (3) Where the major part of the year was abnormally low as shown by record of slaughter for 1940 and the first nine months of 1942. In such case, the months of January to September may be adjusted by using the average of the corresponding months of 1940 and 1942. For the months October to December, either the 1940 slaughter for the corresponding months or the average of the monthly slaughter from January 1 to October 1, 1942 may be used to determine a quota base, the determination of which to use should be made on which more nearly corresponds to the base for the other months of the year.

Section IV

REVIEW OF EVIDENCE SUBMITTED BY BUTCHERS AND LOCAL SLAUGHTERERS

1. Classes of slaughter affected by order.

The Director's Food Distribution Order No. 27.3 requiring review of evidence applies to local slaughterers and butchers; it does not apply to farm slaughterers.

Definitions for these three classes of slaughterers are stated in Food Distribution Order No. 27 and repeated below. As used in these definitions, the term "slaughterer" means the person who owns the livestock in whole or in part at the time of slaughter.

a. Local slaughterer

The term "local slaughterer" means any person who in 1941 slaughtered livestock with a total live weight in excess of 300,000 pounds and who is not registered in accordance with Meat Restriction Order No. 1, as amended.

b. Butcher

The term "butcher" means any person, other than a farm slaughterer, as defined herein, who slaughters livestock with a total live weight of more than 300,000 pounds.

c. Farm slaughterer

The term "farm slaughterer" means any person who is chiefly engaged in producing agricultural products as the resident operator of a farm, who slaughters livestock, and who in 1941 did not deliver meat from the slaughter of livestock with a liveweight of more than 10,000 pounds.

2. Request for Evidence

Under the provisions of the Director's Food Distribution Order No. 27.3 requiring review of evidence, all local slaughterers and butchers are required to submit evidence to substantiate the number of each species of livestock slaughtered each month of the base period as set forth in their present permits. On most of these permits these figures show the slaughter for the year 1941. In some instances, however, these figures show the slaughter for only a part of the year 1941 or show the slaughter for the months subsequent to December 1941 during which the applicant slaughtered.

3. Nature of Evidence

The types of evidence which the permit holder may submit and which will be considered adequate are:

- a. A detailed certified statement of the livestock slaughtered monthly by the permit holder showing by species the number of head and either live or dressed weight, except that for hogs live weight should be shown. These data are to be taken from the books and records of the applicant kept in the

usual course of business. This statement should include only the livestock owned by the applicant at the time of slaughter and should not include livestock slaughtered for others.

- b. In case the permit holder has not kept books and records, the following types of information may be submitted for consideration:
- (1) Records of livestock purchased for slaughter. This information may be obtained from the books of auction companies, commission firms, and others from whom livestock has been purchased. The applicant should obtain from such sellers a certificate that the information is taken from their books and records and is true and correct.
 - (2) Records of livestock inspected at time of slaughter in instances where slaughter was under Federal, State, county, or city inspection. If information of this type is submitted, it should be accompanied by a certificate from a responsible officer who has charge of the inspection records.
 - (3) Records of meat graded. Where the meat has been graded by federal graders or under Federal supervision, a statement taken from the records of meat graded for the permit holder certified by the official in charge, may be submitted.
 - (4) Certified records of sales of hides, pelts, and other by-products. In some instances, the permit holder may obtain from official sources or from the purchaser, records of this character which will be of assistance in establishing the number of livestock slaughtered.
- c. If the permit holder is unable to furnish any of the information coming under paragraphs (1) and (2), he should be allowed to submit for consideration any other evidence which may be relevant and which may aid in establishing the quota base. Evidence of this nature, however, should be given the most careful scrutiny and in almost all cases cannot be given equal weight with the documentary evidence described above.

Total sales of meat are of little evidential value, as it is virtually impossible to segregate the amounts purchased from amounts slaughtered by the applicant, and only the amount of livestock owned at the time of slaughter should be considered. Likewise, plant capacity is of little significance as very few plants operate for an extended period at capacity.

In those instances where the permit holder has not kept accurate books and records, every effort should be made to develop documentary information upon which an equitable quota base may be determined. If acceptable evidence for the development of an equitable quota base cannot be developed within 10 days, cancellation of the permit should be recommended.

4. Sanitary requirements and adequacy of facilities

It shall be the duty of each County War Meat Committee to ascertain whether or not each local slaughterer or butcher who submits evidence supporting his 1941 or 1942 quota base has the minimum sanitary facilities for slaughter required by Food Distribution Order No. 27, and also to ascertain whether such persons have adequate facilities for the conservation and preservation of all edible and the principal inedible by-products. Compliance with sanitary requirements for Federal, State, county or city inspection shall be considered as compliance with the requirements for sanitary facilities under the order. The County War Meat Committee should obtain active participation by the appropriate health officer in making these determinations. Once the determinations have been made, they should include, along with the recommendation for the continuation or cancellation or adjustment of each permit, a certified statement to the effect that the Committee is fully satisfied (or is not satisfied) that the person whose permit is under consideration has the minimum facilities.

a. Requirements for Minimum Sanitary Facilities

- (1) A structure that is reasonably fly and rodent proof with ample light and ventilation.
- (2) A structure which has concrete or comparably sanitary floors with adequate drainage system.
- (3) A structure which is provided with clean water and which, together with all equipment, is in a clean and orderly condition.
- (4) The structure must be a reasonable distance from stables, barnyards, hoglot, refuse heap, privy, or other source of fly breeding or contamination.

b. Requirements for Adequate Facilities for Conservation and Preservation of all Edible and the Principal Inedible By-Products.

- (1) Equipment in good order for the proper skinning and dressing of animals and rendering of fat or tallow.
- (2) Storage and other equipment for retaining or preserving edible or inedible by-products to insure against spoilage.

A. Procedure for reviewing evidence submitted by butchers

Evidence in support of the butcher's permit shall be submitted by him to the County War Meat Committee.

1. Cancellation or Adjustment Downward of Quota

- a. If after review and after the receipt of additional information (if it is provided) the evidence is found to be insufficient and unacceptable or the facilities are inadequate or unsanitary, the County War Meat Committee will recommend cancellation or adjustment downward of the quota to the area supervisor.
- b. If the area supervisor concurs, he shall send a notice (Exhibit 1) to the butcher informing him that his quota base may be adjusted downward or cancelled, as the case may be, and that the butcher will be afforded an opportunity to appear, if he so desires, before the area supervisor and one or more members of the County War Meat Committee before final action is taken.
- c. The area supervisor shall prepare an adequate record of the facts developed at the appearance of the butcher.
- d. After the butcher has so appeared, the area supervisor, taking into account the recommendations of attending members of the County War Meat Committee, shall decide the case and inform the butcher by letter of the decision (Exhibit 2).

2. Approval of Present Quota

- a. If the County War Meat Committee finds the evidence is sufficient to justify the quota base as set out in the application and that the facilities available are adequate and sanitary, the Committee shall submit its recommendation for approval of the present quota to the area supervisor.
- b. If the area supervisor concurs with this recommendation, he shall approve the butcher's quota base and so notify the butcher and forward a copy of this notification to the County War Meat Committee.

3. Disagreement

- a. If the County War Meat Committee recommends continuation of the present quota and the area supervisor does not concur, the area supervisor shall discuss the case with the County War Meat Committee and attempt to come to an agreement with it. If an agreement is reached, the procedure outlined in

2 above shall be followed. If an agreement is not reached, the area supervisor shall arrange for the butcher to appear as outlined above. At this appearance the area supervisor shall keep an appropriate record of the facts developed. The entire record, consisting of the evidence submitted by the butcher, the facts developed during the appearance of the butcher, the recommendations of the County War Meat Committee, and of the area supervisor, shall then be transmitted to the State War Board for decision. The State War Board shall notify the butcher of the decision and forward copies of this notification to the area supervisor and the County War Meat Committee.

- b. If the County War Meat Committee recommends adjustment downward or cancellation of the quota base and the area supervisor does not concur, the area supervisor will discuss the case with the County War Meat Committee and attempt to come to an agreement with it. In cases where the County War Meat Committee and the area supervisor do not agree that the present quota shall be approved, the procedure outlined under a. above shall be followed.

B. Procedure for review of local slaughterer's permits

Evidence in support of the local slaughterers' permit shall be submitted by him to the County War Meat Committee. This Committee shall review the evidence and if it finds that the evidence is insufficient to support the original quota base, the permit holder should be informed in what respects the original evidence was insufficient and should be given 10 days to furnish additional evidence. The County War Meat Committee shall then transmit the evidence received to the area supervisor, together with its recommendations on the evidence and a report as to whether the facilities of the local slaughterer are adequate and sanitary.

1. Area Supervisor

The Area Supervisor will review the evidence of the local slaughterer and the recommendations submitted by the County War Meat Committee and will transmit the entire record to the State War Board with his recommendations.

C. Procedure for adjustment or cancellation of farm slaughterers' quotas

Although the Director's Food Distribution Order No. 27.3 does not require farm slaughterers to submit evidence to substantiate slaughter during the base period, the County War Meat Committee should endeavor to review farm slaughter permits and quotas to determine whether they are justified or excessive. Where they appear to be excessive the County War Meat Committee should report that fact to the area supervisor. The area supervisor should then follow the same procedure as is outlined for the review of butcher evidence when the County War Meat Committee recommends adjustment downward or cancellation of the quota.

D. Certification as to accuracy of facts

In any of the above procedural steps which require the County War Meat Committee to receive, verify, and make recommendations as to whether the permit holder has provided minimum sanitary facilities and adequate facilities for the conservation and preservation of all edible and the principal inedible by-products, the County War Meat Committee shall make a written certification to the effect that the information transmitted is true and correct to the best of the knowledge of the members of the committee. It should be noted that whenever reference is made to the County War Meat Committee in the above procedure it is to be understood that this committee functions as a subcommittee of the County War Board.

E. Informing butchers and local slaughterers of right to appeal

Letters which inform butchers or local slaughterers that their quota has been cancelled or adjusted downward should outline the procedure for appealing the decision, if desired. Inclusion of such a statement in letters of this type will avoid confusion and assure fair treatment for the permittee.

F. Developing adequate records to support administrative action taken

Sound administrative practice requires that each recommendation and action required by the above procedure be supported and justified by the written record. Development of reasonably complete written records will not only facilitate and improve subsequent reviews of the case but will also help protect the administrative office involved from charges of arbitrary or unfounded action. It is recognized that the heavy load of work incident to the slaughter permit program will cut heavily into the time available for developing such records. Yet without such records to justify actions which have important consequences on the economic life of many local slaughterers and butchers, the basis for the operation of the entire slaughter permit program may be annulled through adverse court proceedings. Adequate records must, therefore, be kept.

G. Publishing permit data

After the review of outstanding permits is completed, each County War Meat Committee shall publish, wherever free publication can be arranged, in its local papers the names of each local slaughterer, butcher and farm slaughterer who holds a slaughter permit. The information published shall group each class of slaughterer separately and shall list the name and address of the person to whom the permit was issued, the permit number and the quota base for each year, by species. If additional permits are issued, or if changes are made as a result of petitions or for other reasons, they shall also be published.

Section V PROCEDURE ON HANDLING PETITIONS FOR QUOTA ADJUSTMENTS

A. Farm slaughterer

1. Denial of petition

When the County War Meat Committee recommends denial of the petition and the area supervisor concurs, the area supervisor shall deny the petition and so notify the farm slaughterer, with a copy of such notice going to the County War Meat Committee.

2. Approval of petition

When the County War Meat Committee recommends approval of the petition and the area supervisor concurs, the area supervisor shall approve the petition and so notify the farm slaughterer, with a copy of such notice going to the County War Meat Committee.

3. Disagreement

If the area supervisor does not concur with the recommendations of the County War Meat Committee and fails to come to an agreement with the Committee after a discussion of the case, he shall refer the entire case to the State War Board for determination.

4. Action by State War Board

The State War Board shall approve or deny the petition in accordance with all the facts and recommendations submitted. It shall notify the farm slaughterer of the decision, with copies of this notice going to the area supervisor and the County War Meat Committee.

B. Butcher and local slaughterer

1. Area Supervisor

The area supervisor will carefully review the petition and refer it to the State War Board for determination with his recommendations and those of the County War Meat Committee as to approval or disapproval.

2. State War Board

The State War Board shall approve or deny petitions from butchers and local slaughterers, taking into account the recommendations of the area supervisor and the County War Meat Committee. It shall notify the butcher or local slaughterer concerned of this decision and forward copies of this notice to the area supervisor and the County War Meat Committee.

C. General observation

We have analyzed a large number of petitions for relief submitted under paragraph 1410.4(j). A large part of the petitions claiming inadequate supplies in the area, allege an increase in population, a failure of the usual sources to supply meat, or both. They usually request a large increase in beef quotas. No increase in quota can be justified unless, because of the transportation situations or the cost of delivering meats to the area in comparison with the delivery allowances, a community or area is normally dependent almost entirely on local slaughter and an increase in local slaughter therefore provides the only means by which provision may be made for taking care of an increase in population. An increase should be made only in extremely acute situations in which there is a plentiful supply of locally-produced livestock. An increase should never be granted for beef if other types of livestock are available. In any event any increase should be confined to slaughterers who sell meat wholesale and who slaughtered in 1941. Increases should not be granted to slaughterers who sell retail meats or persons who did not slaughter in 1941, unless they are the only slaughterers available to meet the acute situation.

D. Undue hardship

What constitutes unreasonable or exceptional hardship is a question of degree of hardship upon the individual slaughterer. There are very few cases in which it may be said that refusal of a permit to an individual who desires to enter the slaughtering business imposes an undue or unreasonable hardship on him. Inability to obtain meats through usual channels on the part of a retailer or wholesaler is not sufficient to constitute undue hardship and to justify the person's engaging in the slaughtering business in order to obtain supplies. Each case in which a petition is filed which cannot be handled under the policy outlined above should be carefully analyzed and, if full facts are not presented, the needed information should be requested. Disturbed economic conditions resulting from the war are not considered as affording a basis for relief under the hardship clause. If the basis alleged in the petition cannot be traced to such disturbed economic conditions, the allegations of the petitioner may fall within the undue hardship clause.

Section VI

PROCEDURE ON COMPLIANCE

A. Procedure for educational compliance

1. County War Meat Committee

The County War Meat Committee should acquaint itself fully with the need for and objectives of the permit system, as well as the black market problems, and it should disseminate information concerning these by all

possible means, including public meetings, group meetings with housewives, the meat industry, farmers, local public officials, and public organizations through newspapers and other media. It shall create and maintain strong public support of the meat programs, so that this extremely important food will serve its fullest possibilities as a weapon of war. Under the technical guidance of the area supervisor, it should call the provisions of the slaughter permit order to the attention of persons who are not aware of its existence or operating in willful disregard of it, and obtain such compliance as is possible by persuasion, dissemination of information, or other informal means.

B. Suggestions for County War Meat Committee members to combat the black market

Either by action taken at a committee meeting or simply through a statement by the Chairman, announce decision that the anti-black market message will be made by word of mouth campaign sponsored by the committee.

1. Arrangements should be made by the Chairman or a competent person of the committee for speaking engagements for committee members before such groups as the American Legion, Parent Teachers' Associations, Chamber of Commerce, civic organizations and fraternal groups.
2. The speakers should be provided with the attached outline on black markets.
3. Announcement of such speaking dates thus set up should be made to the press and radio.
4. Arrangements should be made with newspapers to cover such meetings.
5. All groups thus addressed should pass resolutions endorsing the anti-black market campaign and pledge the support of its individual members in pushing the community campaigns.

I. Wholesalers

1. An inspirational bulletin should be sent to all wholesalers having city or county salesmen, urging them to carry the message of the necessity of the black market campaign by word of mouth to retail outlets.
2. Truck posters can be prepared by wholesalers as part of their regular institutional advertising.
3. Wholesalers should be asked to use anti-black

market material in their contract, institutional advertising space in all media, including hi-spots and poster boards.

II Trade Papers

1. Stories can be used in all trade papers using general background material quoting committee members engaged in the trade covered by the specific periodical.

III Civic Officials

1. Mayors and selectmen should be contacted through influential committee members to issue formal proclamations calling upon their constituents to support the campaign against black markets as an essential and continuing part of civilian participation in the war effort.
2. Similar action by resolution should be taken by such groups as the Legion, fraternal and civic clubs where the time element makes it impossible for personal appearances by speakers and the securing of such action as indicated earlier in this outline.

IV Clergy

1. A letter may be sent to the pastors of all congregations asking that they incorporate in their sermons on any given weekend, a strong plea for participation by their parishoners in the anti-black market campaign.

V Window Displays

1. Space in bank and public utility lobbies as well as newspaper and similar offices can be secured for visual displays.
 - (a) Suggestions for such displays will carry the strongest local appeal, if they come from advertising departments of local trade papers or newspapers. There is no objection to such displays carrying such identifications as "Contributed by (blank) firm, in the interest of (town's) community's campaign against black markets."

VI Pictures

1. News pictures should be used whenever possible.
 - (a) A member of the committee visiting a local cooler and being shown the Federal stamp on a section of slaughtered meat can be used.

- (b) A picture of the mayor or club president presenting a copy of the resolution or proclamation to the War Committee Chairman will always be acceptable due to the local figures involved.
- (c) Use pictures of good-looking girls whenever possible. For instance, a picture taken in a cooking school with an accompanying story pledging the members to take part in the campaign.
- (d) A picture of a typical young housewife being shown the inspection stamp on a piece of meat by her neighborhood butcher in his store.

C. Information concerning the campaign against black markets

- 1. Book VII, The Campaign Against Black Markets in Meats, and Supplement provides County War Meat Committee members with suggestions on how to combat the black market.

Section VII PROCEDURE IN ADMINISTERING CUSTOM SLAUGHTER PERMITS

Under Food Distribution Order 27, Amendment 4, custom slaughterers are required, after July 1, to obtain a permit to slaughter. Pursuant to Director's Food Distribution Order 27.3, applications for such permits should be filed with the County War Meat Committee of the County War Board for the county in which the applicant is located by August 1. The County War Meat Committee will forward these applications and any appeals filed in connection therewith will be the same as the procedure established for the handling of butcher permits and appeals as set out in this handbook.

A. Permit form for custom slaughterer

Exhibit 3 attached hereto is the permit form to be used in the issuance of these permits. This form should be filled out in quadruplicate. All four copies should be signed by the applicant and forwarded by the County War Meat Committee to the Area Supervisor who will issue the permits. One copy will then be returned to the applicant, one copy returned to the County War Meat Committee and two copies forwarded to the state meat marketing supervisor.

These permit numbers will consist of an assigned number beginning with "1" and continuing consecutively, preceded by the letters "PC" and the county and state ("13") codes.

B. Certification Form for Custom Slaughtered Livestock

Exhibit 4 attached hereto is the form for "Certification of Custom-slaughtered Livestock" to be used in recording all custom-slaughtering operations in compliance with Food Distribution Order 27, Amendment 4. A copy of this form shall be executed jointly by all persons who slaughter livestock on a custom basis (whether farm slaughterers, butchers, local slaughterers or custom slaughterers) and by the owners of all livestock so slaughtered. These certifications shall be retained by the custom slaughterer for two years and shall

be subject to inspection by the Director, Food Distribution Administration. The forms should be duplicated and furnished the County War Meat Committees along with the permit forms.

The County War Meat Committees should be requested to take all necessary steps to inform persons who slaughter livestock on a custom basis in their county of the procedure through which these permits and certification forms will be issued.

Section VIII

PROCEDURE FOR ISSUING IDENTIFICATION CARDS FOR LIVESTOCK DEALERS

The purpose of this procedure is as follows: Under the provisions of FDO 26, permits have been issued to persons engaged in business as livestock dealers. These permits were issued as part of the livestock program designed to control the slaughter of livestock through legitimate trade channels and to restrict "black market" operations. There have been prepared identification cards which will be issued to the holders of dealer's permits as a means of identification both of the individual dealers and their employees or agents. It is requested that the County War Meat Committees advise the State meat marketing supervisor of the number of cards which will be required in order to furnish each holder of a permit under FDO No. 26, with a card. As soon as we have been advised as to the number of cards required in each county, arrangements will be made to send that number to County War Meat Committee. Upon receipt of the blank identification cards, these cards will be issued to Livestock Dealers and their employees for identification purposes. It is requested that each dealer, or employee, who desires a card, be required to appear personally before the County War Meat Committee and fill out Form FDO-26-3.

A record of the cards issued should be taken on Form FDO-26-3; which should be prepared in duplicate, one copy of this form to be forwarded to the office of the state meat marketing supervisor.

The person to whom a card (FDO-26-2) is issued should be required to sign the certification on the bottom of Form FDO-26-3. In these instances where cards are issued to employees, the owner, partner or responsible officer of the firm to whom the permit has been issued should sign on the reverse side of the identification card (FDO-26-2). The issuing agency should prepare and forward to the State meat marketing supervisor by August 1 a list, in duplicate, showing the serial numbers of the identification cards issued, with the names, addresses and permit numbers of the persons to whom issued.

Section IX

COPIES OF FOOD DISTRIBUTION ORDERS 26 & 27 with Amendments

Section X

FLOW CHARTS

1. Flow chart of procedure for review of evidence (Exhibit 5)
2. Flow chart of procedure for petitions and appeals (" 6)
3. Flow chart of procedure for issuance of slaughter permits (Exhibit 7)

